

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

STEPHEN CALLAHAN,

Plaintiff,

v.

HSBC SECURITIES (USA) INC., HSBC  
NORTH AMERICA HOLDINGS INC., AND  
HSBC HOLDINGS PLC,

Defendants.

Case No.: 1:22-cv-08621-JPO

Hon. J. Paul Oetken

**ORAL ARGUMENT REQUESTED**

**DEFENDANT HSBC HOLDINGS PLC'S NOTICE OF MOTION  
TO DISMISS THE COMPLAINT PURSUANT TO FED. R. CIV. P. 12(B)(2) and 12(B)(6)**

**PLEASE TAKE NOTICE** that upon the accompanying Memorandum of Law, dated February 6, 2023, and in accordance with the schedule adopted by the Court by Order dated December 29, 2022 (ECF No. 17), the undersigned counsel for Defendant HSBC Holdings plc will move this Court, before the Honorable J. Paul Oetken, United States District Judge, in Courtroom 706, Thurgood Marshall United States Courthouse, 40 Foley Square, New York, New York, on a date and time designated by this Court, for an order dismissing the Complaint pursuant to Federal Rules of Civil Procedure 12(b)(2) and 12(b)(6).

Dated: February 6, 2023  
New York, New York

Respectfully submitted,

/s/ Tracy Richelle High

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*Attorneys for Defendant HSBC Holdings PLC*

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**ORAL ARGUMENT REQUESTED**

**DEFENDANT HSBC NORTH AMERICA HOLDINGS INC.'S NOTICE OF  
MOTION TO DISMISS THE COMPLAINT PURSUANT TO FED. R. CIV. P. 12(B)(6)**

PLEASE TAKE NOTICE that upon the accompanying Memorandum of Law, dated February 6, 2023, and in accordance with the schedule adopted by the Court by Order dated December 29, 2022 (ECF No. 17), the undersigned counsel for Defendant HSBC North America Holdings Inc. will move this Court, before the Honorable J. Paul Oetken, United States District Judge, in Courtroom 706, Thurgood Marshall United States Courthouse, 40 Foley Square, New York, New York, on a date and time designated by this Court, for an order dismissing the Complaint pursuant to Federal Rules of Civil Procedure 12(b)(6).

Dated: February 6, 2023  
New York, New York

Respectfully submitted,

/s/ Tracy Richelle High

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**ORAL ARGUMENT REQUESTED**

**DEFENDANT HSBC SECURITIES (USA) INC.'S NOTICE OF MOTION  
TO DISMISS THE COMPLAINT PURSUANT TO FED. R. CIV. P. 12(B)(6)**

**PLEASE TAKE NOTICE** that upon the accompanying Memorandum of Law, dated February 6, 2023, and in accordance with the schedule adopted by the Court by Order dated December 29, 2022 (ECF No. 17), the undersigned counsel for Defendant HSBC Securities (USA) Inc. will move this Court, before the Honorable J. Paul Oetken, United States District Judge, in Courtroom 706, Thurgood Marshall United States Courthouse, 40 Foley Square, New York, New York, on a date and time designated by this Court, for an order dismissing the Complaint pursuant to Federal Rule of Civil Procedure 12(b)(6).

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Respectfully submitted,

/s/ Tracy Richelle High

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